

**CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.**

**COUNSELLORS AT LAW**

CHARLES C. CARELLA  
BRENDAN T. BYRNE  
JAN ALAN BRODY  
JOHN M. AGNELLO  
CHARLES M. CARELLA  
JAMES E. CECCHI

JAMES D. CECCHI (1933-1995)  
JOHN G. GILFILLAN III (1936-2008)  
ELLIOT M. OLSTEIN (1939-2014)

JAMES T. BYERS  
DONALD F. MICELI  
A. RICHARD ROSS  
CARL R. WOODWARD, III  
MELISSA E. FLAX  
DAVID G. GILFILLAN  
G. GLENNON TROUBLEFIELD  
BRIAN H. FENLON  
LINDSEY H. TAYLOR  
CAROLINE F. BARTLETT

**5 BECKER FARM ROAD  
ROSELAND, N.J. 07068-1739  
PHONE (973) 994-1700  
FAX (973) 994-1744  
www.carellabyrne.com**

PETER G. STEWART  
FRANCIS C. HAND  
AVRAM S. EULE  
CHRISTOPHER H. WESTRICK\*  
JAMES A. O'BRIEN III\*\*

OF COUNSEL

\*CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
\*\*MEMBER NY AND MA BARS ONLY

RAYMOND J. LILLIE  
WILLIAM SQUIRE  
STEPHEN R. DANEK  
DONALD A. ECKLUND  
MEGAN A. NATALE  
ZACHARY S. BOWER+  
MICHAEL CROSS  
CHRISTOPHER J. BUGGY  
JOHN V. KELLY III  
MICHAEL A. INNES

+MEMBER FL BAR ONLY

October 19, 2018

**VIA ECF**

Honorable Madeline Cox Arleo  
United States District Judge  
United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07101

Re: *Alpha Cepheus, LLC, et al. v. Chinh Chu, et al.,*  
Civil Action No. 18-cv-14322 (MCA) (MAH)

Dear Judge Arleo:

I write regarding the Order to Show Cause filed today in the above-referenced action. This firm is counsel for Defendants Chinh Chu and Douglas Newton. We are working with Eric Brenner of the Boies Schiller firm and will be filing a pro hac motion on his behalf shortly.

The Order to Show Cause application makes a variety of extraordinary and salacious accusations. This is not the time to address all the substantive or procedural infirmities with these claims, including that the application is brought regarding purported harassment of an individual, Paul Parmar, who is not a Plaintiff in the above-captioned case. But there should be no doubt from the outset that Messrs. Chu and Newton unequivocally deny that they or anyone acting at their direction ever unlawfully harassed or threatened violence against Mr. Parmar or his family, or contacted Mr. Parmar to coerce him to take a plea in his criminal case. Like the Plaintiffs' underlying RICO action, these claims are a brazen effort by Mr. Parmar to distract attention from the criminal charges that the United States Attorney's Office is pursuing against him in this District pursuant to the attached Criminal Complaint.

We are happy to brief these issues and file an opposition brief by Wednesday, October 24, 2018. We respectfully submit that the Court should not entertain Plaintiffs' request for discovery prior to having an opportunity to first review our response papers.

Honorable Madeline Cox Arleo

October 19, 2018

Page 2

We would also be happy to appear for a conference to discuss these matters if the Court thinks it would be useful.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

*s/ James E. Cecchi*

JAMES E. CECCHI

Encl.

Cc: Eric Brenner, Esq.